

THE HONORABLE JAMAL N. WHITEHEAD
TRIAL DATE SEPTEMBER 22, 2025
NOTING DATE: February 18, 2025
WITHOUT ORAL ARGUMENT

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

JINBUM CHOI, an individual, and
SANGYOON PARK, an individual,

Plaintiffs,

v.

XAVIER TAULEALEA and “JANE DOE”
TAULEALEA, individually and the marital
community comprised thereof, and
WORLDWIDE FLIGHT SERVICES
(WFS), a corporation,

Defendants.

Case No.: 2:24-CV-00420

**STIPULATION AND AGREED ORDER
TO CONTINUE PRETRIAL DATES**

COME NOW THE PARTIES, by and through their respective counsel of record, who
jointly stipulate and agree as follows:

1. On June 17, 2024, the Court issued a Order Setting Jury Trial Date and Related
Dates, Dkt. # 12.

2. A case schedule may be modified only for good cause and with the judge’s
consent. Fed. R. Civ. P. 16(b)(4). Under the Local Civil Rules, mere failure to complete
discovery within the time allowed does not constitute good cause for an extension or

1 continuance. Local Civ. R. 16(b)(6). The good cause standard is a “non-rigorous standard” that
2 should be liberally construed to effectuate the general purpose of seeing that cases are tried on
3 the merits.” *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1258-59 (9th Cir. 2010).

4 3. Both parties have diligently pursued discovery since the Court’s Order Setting
5 Trial Date. The parties exchanged initial discovery, and are working to complete outstanding
6 discovery, including expert discovery, in advance of mediation. Progress has been complicated
7 as plaintiffs maintain residence part time in South Korea. The parties anticipate that additional
8 time will be required to complete expert discovery, including independent medical examination,
9 in light of the logistical issues this presents. The current trial schedule appears untenable for all
10 parties.

11 4. Currently the parties have multiple trial conflicts for the month of October.
12 Defense counsel currently has six trials set for between October 2025 and December 2025.
13 Plaintiff’s counsel will be in trial in October 2025, and has an extended pre-planned absence in
14 December.

15 5. Both parties have been working productively and cooperatively, including
16 discussing the status of discovery and alternative dispute resolution. The parties intend to look
17 at available mediation dates in October and early November making the current trial date not
18 feasible.

19 6. With this in mind, the parties respectfully request a new trial date of February
20 23, 2026.

21 7. In light of these developments, the parties therefore stipulate to an extension of
22 the current trial date and pre-trial deadlines, as follows:

23 **Parties Proposed new jury trial date: February 23, 2026.**

PRE-TRIAL EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Disclosure of expert testimony under Fed. R. Civ. P. 26(a)(2)	February 24, 2025	July 28, 2025
Disclosure of rebuttal expert testimony under Fed. R. Civ. P. 26(a)(2)	within 30 days after the other party's expert disclosure	within 30 days after the other party's expert disclosure
All motions related to discovery must be filed by (see LCR 7(d))	March 26, 2025	August 27, 2025
Discovery completed by	April 25, 2025	September 26, 2025
All dispositive motions and motions challenging expert witness testimony must be filed by (see LCR 7(d))	May 27, 2025	October 28, 2025
All motions in limine must be filed by (see LCR 7(d))	August 13, 2025	January 14, 2026
Deposition Designations must be submitted to the Court by (see LCR 32(e))	September 2, 2025	February 3, 2026
Agreed Pretrial Order due	September 2, 2025	February 3, 2026
Trial briefs, proposed voir dire, jury instructions, agreed neutral statement of the case and deposition designations due by	September 8, 2025	February 9, 2026
Pretrial conference	September 15, 2025	February 17, 2026

STIPULATION AND AGREED ORDER TO CONTINUE PRETRIAL DATES- 3
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8. By so stipulating, neither Plaintiffs nor Defendant consent to discovery above or beyond those permitted by the Federal Rules of Civil Procedure or this Court's Local Rules.

9. Based upon the stipulation and agreements set forth above, the parties stipulate to the filing of the Agreed Order below.

IT IS SO STIPULATED.

DATED this 18th day of February, 2025.

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AGREED ORDER

Pursuant to the Stipulation above, the Court hereby orders that the identified pretrial dates be reset as agreed by the Parties, and sets a new trial date of February 23, 2026.

DATED this 19th day of February, 2025.



Jamal N. Whitehead
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

DATED this 19th day of February, 2025, at Seattle, Washington.

/s/Hailey K. Delay
Hailey K. Delay